

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

DO NO HARM

PLAINTIFF

V.

CIVIL ACTION NO. 3:24-CV-11-CWR-LGI

**NATIONAL ASSOCIATION OF
EMERGENCY MEDICAL TECHNICIANS**

DEFENDANT

MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT

COMES NOW Defendant National Association of Emergency Medical Technicians (“NAEMT”), through counsel, and moves the Court to dismiss Plaintiff’s Amended Complaint [Doc. 20] for lack of Article III standing under Federal Rule of Civil Procedure 12(b)(1), or in the alternative, for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6).

In support, NAEMT relies on the contemporaneously filed Memorandum in Support of its Motion.

WHEREFORE PREMISES CONSIDERED, NAEMT requests the Court grant its Motion and dismiss all of Plaintiff’s claims of relief and its Amended Complaint with prejudice. NAEMT requests all other and further relief to which it may be entitled to under the circumstances.

Respectfully submitted, this the 18th day of March, 2024.

**NATIONAL ASSOCIATION OF
EMERGENCY MEDICAL TECHNICIANS**

By: /s/ Mary Clark Joyner
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CERTIFICATE OF SERVICE

I do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

THIS the 18th day of March, 2024.

/s/ Mary Clark Joyner